

27. The device of claim 26, wherein said simulation system further includes a case builder operatively interposed between said case manager and said simulator and adapted for editing said selected data generated from said case manager when said selected data is selected by said operator during the selecting step (a), further comprising the steps of:

(d) when the selected data is generated from said case manager in response to the selecting step (a), editing, by said operator, said selected data in said case builder thereby generating edited data,

said edited data being received in said simulator during the receiving step (b),

said simulator performing said simulation and using said edited data in the simulation during the performing step (c).

#### REMARKS

Claims 1 through 19, new claims 20 and 23, and further new claims 24 through 27 are in this application.

Claims 1 through 19 and 20 through 23 were addressed in the previously filed amendment, filed March 18, 2002. This supplemental amendment will deal specifically with new claims 24 through 27.

In the office action dated 12/19/2001, the examiner cited the following three references: Huang, Cowgill, and Gunasekera. In the claims, the structure and function of the case manager is recited. The only reference which the examiner cites to teach the 'case manager' is the Huang reference. Therefore, the following discussion will be directed, primarily, to the Huang reference.

In the embodiments disclosed in the specification, a simulation system includes a case manager and a simulator operatively connected to said case manager, the case manager including a plurality of sets of data and a corresponding plurality of supersets of data organized together in the case manager in the form of a tree like structure, each of the sets of data including a group of data, each of the corresponding supersets of data including the group of data plus additional data not included within the corresponding sets of data. The simulation system practices a method of performing a simulation which comprises the following steps: (a) selecting, by an operator, at least one of the sets of data or at least one of the supersets of data in the tree like structure of the case manager, the selected data being generated from the case manager when the selected data is selected by the operator, (b) receiving the selected data, selected by the operator during the selecting step (a), in the simulator, and (c) performing, by the simulator, the simulation and using, by the simulator, the selected data which is received in the simulator during the receiving step (b).

In the Huang reference (which is the only reference cited by the examiner to teach the method steps practiced by the case manager, and in particular, the tree like structure, recited in all claims of this application), the examiner cites figure 59 of Huang, which is attached hereto as Exhibit 1. Figure 59 of Huang is discussed in column 109, lines 44-61, which is attached hereto as Exhibit 2. The only discussion which supports figure 59 in Huang is found in Exhibit 2 attached hereto, lines 44-61 (see the box in Exhibit 2 attached hereto). Figure 59 of Huang is supported by only a 'small amount of disclosure' (see the box in Exhibit 2).

Therefore, the claims require the following 'concept': a simulation system practices a method of performing a simulation which comprises the following steps: (a) selecting, by an operator, at least one of the sets of data or at least one of the supersets of data in the tree like structure of the case manager, the selected data being generated from the case manager when the selected data is selected by the operator, (b) receiving the selected data, selected by the operator during the selecting step (a), in the simulator, and (c)

performing, by the simulator, the simulation and using, by the simulator, the selected data which is received in the simulator during the receiving step (b).

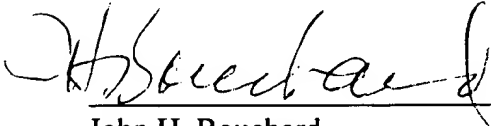
It is respectfully submitted that the 'small amount of disclosure' set forth in the box of Exhibit 2 attached hereto fails to disclose, teach or suggest the above referenced 'concept' which is present in each of the new claims 24-27. The major problem with Huang is that, from the 'small amount of disclosure', it is impossible to tell whether the data selected in the boxes of Huang's figure 59 will be input to a simulator for use by the simulator during its execution. The 'small amount of disclosure' in Exhibit 2 attached hereto fails to disclose any detail with regard to figure 59. Each of the new claims 24-27 of this application recite the following concept: selecting sets or supersets from the tree like structure of the case manager thereby generating data, receiving that data in the simulator, and executing the simulator while using the data selected from the tree like structure of the case manager. Huang's figure 59 of Exhibit 1, and its accompanying disclosure set forth in the box of Exhibit 2, fails to disclose that concept because the 'small amount of disclosure' in the box of Exhibit 2 is simply too brief and too short to provide any significant teaching of any significant depth or dimension.

Therefore, it is respectfully submitted that the new claims 24-27 are patentable over the Huang, Cowgill, and Gunasekera references, and an early notice of allowance is earnestly solicited.

Accordingly, in view of the foregoing amendments and remarks, reconsideration and allowance of claims 1 through 19, new claims 20 and 23, and further new claims 24-27 is respectfully requested.

Please charge any additional fee and credit any overpayment to deposit account 07-1078.

Respectfully Submitted,

A handwritten signature in dark ink, appearing to read "J. Bouchard", with a horizontal line drawn underneath it.

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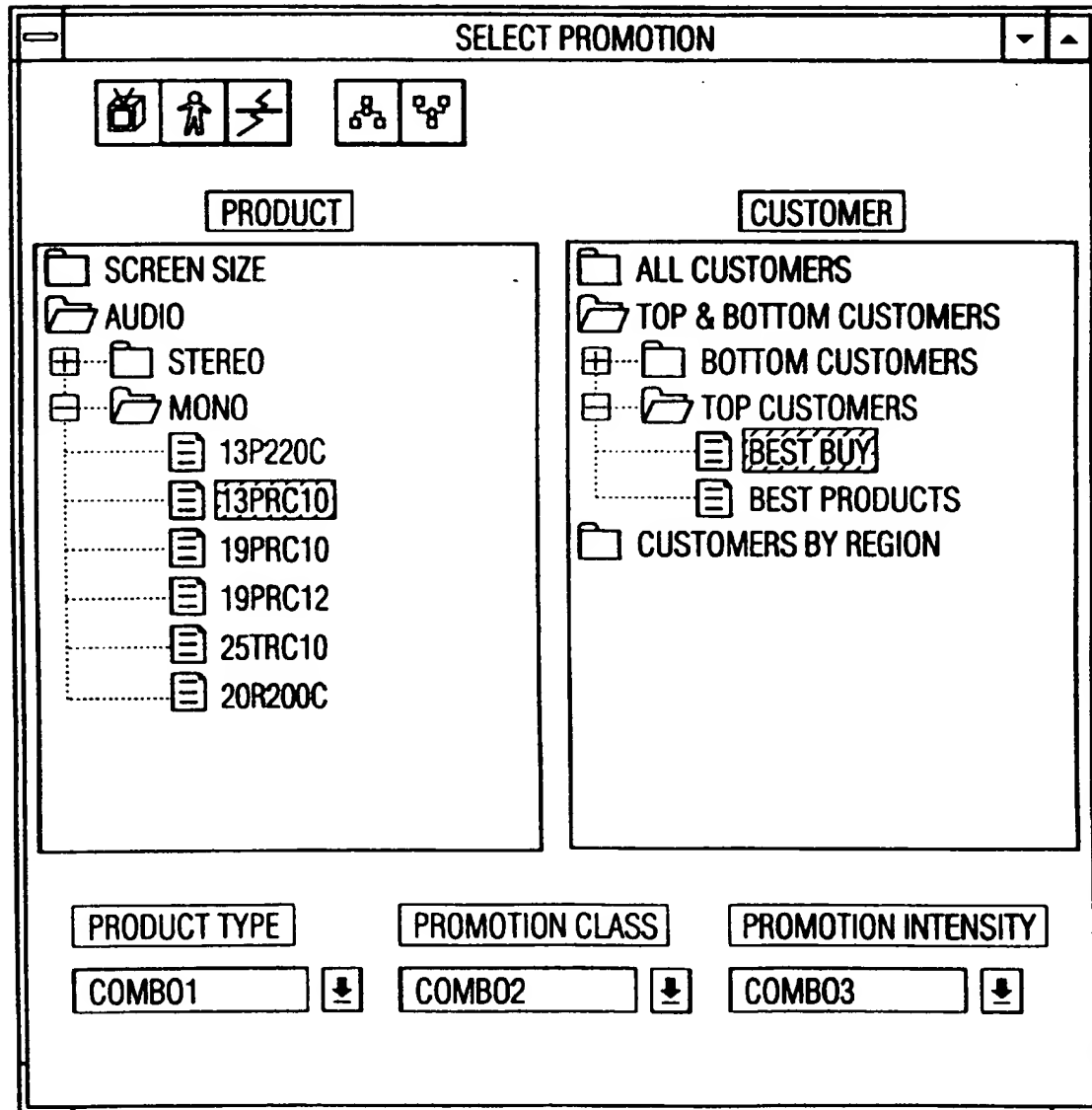


FIG. 59

EXHIBIT

1

## Customer Table

The bottom table displays all customers who carry any of the products selected in the Product table. If a customer carries all of the selected products, it is displayed in a focused font, otherwise it is shown in normal font. Sales data for each customer is shown. The entries beneath each product include actual orders, forward orders, and orientation orders. As with the Product table, the customer table is split to show both historical and Forecast Data 146. The user may specify the position in the time series for the historical and Forecast Data 146. Promotion periods are highlighted on the display.

## Total Columns

On the right side of the Customer table are three columns which can display a selection of user-defined totals from the following choices: YTD Year to date; YTG Year to go; YTDL Year to date last year; YTDL Year to date budget; YTGB Year to go budget; and L12M Last 12 months.

## General Features

Promotion periods are displayed highlighted. The impact of promoted versus unpromoted sales can be displayed separately in drop-off cells. The mix percentage can be used to disaggregate a forecast generated at the aggregated level of the customer or customer group.

Disaggregation can also be done based on the total for the year and some user defined seasonality factors when the menu option "Disaggregate Total Year" is chosen. Time series of user defined "leading indicators" can be displayed for reference and forecasting purposes.

## Sales Promotion Analysis

The User Interface that supports Sales Promotion Analysis is built around the promotion calendar. The promotion calendar shows the list of all the past and planned promotions for the set of products and customers defined by the selected domain.

For each promotion the following is displayed in the promotion calendar: starting date of the promotion; end date of the promotion; promotion type; promotion class; product being promoted; customers supporting the promotions; promotion intensity; and impact of the promotion.

When the user clicks on the promotion calendar button on the toolbar, the promotion calendar Main Display Window is displayed (see FIG. 58).

The user can select one or several promotions in the promotion calendar. For these promotions the user can perform the operations discussed below. Display shipment and POS Data 138 in table formats similar to the one used in BU and TD forecasts. Compute the promotion impact for past promotions. Estimate the impact of future promotions. Display graphically the impact of the promotions on sales.

If the user wishes to view the customer-product tuple (domain) that promotions are displayed for, or wishes to limit the promotions shown by choosing what Promotion Type, Promotion Class and Promotion Intensity he wishes to analyze, the Promotion Selection Wizard may be invoked. The user selects the customer-product pairs that analysis is to take place on and can limit the selection by choosing what Promotion Type, Promotion Class and Promotion Intensity he wishes to analyze. When the OK button is clicked, the Promotion Calendar dialog box is populated with all promotions that match the selection criteria (See FIG. 59).

## PSI Frame

The PSI main screen is a work area where the user can experiment with different Production, Inventory and Sales figures and see the effects caused by these changes to eventually converge to the most desirable PSI plan 190. The Main PSI Screen (see FIG. 61) initially shows the

Production, Inventory and Sales for all of the products in the user selected domain. The figures for all of the products are aggregated together and shown. The user may also select any individual product in the aggregation and show the numbers for this product alone. This can be done by choosing the desired product number from the Product selection combo box located near the top left of the screen. The first choice in the combo box is always All Products to allow the aggregation of all products to be shown. The user may change the products being analyzed by selecting a new set of products from all available products. This may be done by selecting a new domain.

Directly following the Production (P), Inventory (I) and Sales (S) lines are Temporary P, S and I lines (see FIG. 60). This is a work area where the user may copy and experiment with the real P, S or I figures and modify them to create new Scenarios 78. Copy and Paste are enabled on this form so the user may copy the original numbers to the work areas. The user may also copy a time series from another part of the DSS 10 or a separate application to the temporary lines through copy and paste. Lastly, the user may load data from a saved scenario to the temporary lines on the form. The individual cells that comprise the temporary work area may be manually edited by the user by clicking on the desired cell and changing the value in the cell.

Also present on the work area of the form are Top-Down, Bottom Up, Customer demand information, a Top-Down minus Bottom Up (TD-BU) and Top-Down minus Sales (TD-S) lines. These lines give the user different and useful views into the planning data under analysis. These lines are calculated based on the values in the temporary P, S and I lines of the form.

The last column displayed on the screen is a sum of the data displayed on the screen for the current year. This column remains on the screen and does not scroll left to right as other columns are being scrolled horizontally. The titles of the various horizontal lines of data also does not scroll, but the data series may be scrolled forward or backward through time. The month and year associated with the data are displayed immediately above the working area of the screen.

## PSI Reconciliation

While working with the data in the temporary P, I and S lines, the user may want to make sure the three lines are always consistent. This may be accomplished by selecting PSI Reconciliation on the Options menu (see FIG. 62).

When selected, a check mark will appear next to this menu choice and the PSI screen will reconcile all data input by the user. PSI Reconciliation 170 functions by updating one line of data based on a new value input into a different line. The user has control over which line gets updated by setting the PSI reconciliation order.

The user sets the PSI reconciliation order by choosing PSI Reconciliation Order from the Options Menu (see FIG. 61). This will open the PSI Reconciliation Dialog Box (see FIG. 62). From this window the user can choose which line(P, S or I) is updated when the selected line is modified by the user. In the example shown, the I line would be updated when the Production line is changed.

## Capacity Checking

While working with the Production, Inventory and Sales figures, the user may wish to check the capacity of the existing production resources to determine if the current plan is feasible. This is known as capacity checking. This can be accessed by clicking the Check Capacity button on the Options menu group on the main PSI screen. The main capacity checking dialog box will then be displayed (see FIG. 63).